

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Corinne Sanford
Debtor

Fay Servicing, LLC as servicer for U.S.
Bank Trust National Association, not in
its individual capacity, but solely as
Trustee of LSRMF MH Master
Participation Trust II

v.

Corinne Sanford
Kenneth E. West
Respondents

CASE NO.: 24-14270-pmm

CHAPTER 13

Judge: Patricia M. Mayer

Hearing Date: March 19, 2025 at 1:00 pm

Objection Deadline: March 14, 2025

**DECLARATION IN SUPPORT OF MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

I, Kimberly N. Wright, certify the following to be true under penalty of perjury:

1. I am employed as a Assistant Vice President-Bankruptcy for Fay Servicing, LLC as servicer for U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSRMF MH Master Participation Trust II (the “Movant”) and am authorized to execute this declaration on behalf of Movant. This declaration is offered in support of the Motion for Relief from the Automatic Stay annexed hereto.

2. In my capacity as Assistant Vice President-Bankruptcy, I have access to Movant’s business records, including the business records for and relating to the loan of the Debtor, Corinne Sanford, secured by the real property known as 1204 West Susquehanna Avenue, Philadelphia, PA 19122 (the “Property”). The facts stated in this declaration are based upon information that I have obtained by reviewing records maintained in the ordinary course of business, as part of regularly conducted business activity, by or from information transmitted by person(s) with knowledge of the events

described therein, at or near the time of the event described.

3. According to business records, Corinne Sanford executed and delivered a Note dated June 13, 2008, in favor Pennsylvania Equity Resources, Inc. (the "Original Lender"), in the original principal amount of \$65,000.00. The Note is secured by a Mortgage executed and delivered by the Corinne Sanford to Original Lender.

4. As of February 6, 2025, the total obligations to Movant less any partial payment and suspense balance is \$97,290.44.

5. As of February 6, 2025, the Debtor is post-petition due for December 1, 2024. The post-petition default is broken down as follows:

<u>Monthly payments due</u>	<u>Amount</u>
Missed Payments 12/01/2024 - 02/01/2025 @ \$490.04 each	\$1,470.12
Filing Costs	\$199.00
Attorneys Fees	\$1,350.00
Total	\$3,019.12

Post-Petition Payment Breakdown

6. The total amount of post-petition arrearage/delinquency is \$3,019.12. The next post-petition payment will become due on March 01, 2025 in the amount of \$490.04.

7. I hereby certify, under penalty of perjury, that the foregoing is true and correct.

Executed this 27th day of February, 2025

/s/ Kimberly N. Wright
Signature

Name Kimberly N. Wright

Assistant Vice President, Bankruptcy
Title